

**Federal Defenders
OF NEW YORK, INC.**

Southern District

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December 9, 2019

By ECF/Hand

Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: Dec. 10, 2019

Dear Judge Gardephe:

With the consent of the Government and Pretrial Services Officer John Moscato, I write to respectfully request a modification of the terms and conditions of Anthony Rose's bail. Specifically, I request that Mr. Rose be allowed to: (1) have contact with his wife, Tara Rose, unrelated to this case and without counsel present; (2) attend church; and (3) seek and maintain employment, which would require a change of status from home incarceration to home detention.

Mr. Rose was arrested and arraigned on November 7, 2019. At that time, the Court determined that Mr. Rose could be released on a \$1,000,000 personal recognizance bond signed by three financially responsible persons and secured by \$20,000 cash/property and Mr. Rose's mother's home. The Court ordered that, upon release, Mr. Rose would be placed on home incarceration with electronic monitoring. He was also ordered to have no contact with his codefendants, surrender his travel documents and make no new applications, undergo pretrial supervision as directed, submit to drug testing and treatment as directed, and not possess any firearm, destructive device, or other weapon. Mr. Rose was detained until all conditions were met on the evening of Tuesday, December 3, 2019.

Mr. Rose requests permission to have contact, unrelated to this case, with his wife, Tara Rose, who is charged as a codefendant. Tara Rose had a stroke a few weeks before Mr. Rose's arrest and Mr. Rose was one of her primary caretakers.

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Re: *United States v. Anthony Rose*, 19 Cr. 789 (PGG)

Mr. Rose requests permission to seek and maintain employment so that he can support himself, his wife, and his 10- and 16-year-old stepchildren. He already has leads on several potential jobs—one as a truck driver, one as a janitor for an event space in Manhattan, and one at Costco in Far Rockaway. Pretrial Services Officer John Moscato has informed me that, in order for Mr. Rose to work outside his home, the Court would need to change his status from home incarceration to home detention with location monitoring.

Finally, Mr. Rose requests permission to attend church. For more than ten years, his family regularly has attended services at the Christian Cultural Center in East New York, Brooklyn, and the Greater Allen AME Cathedral in Jamaica, Queens. Mr. Rose would be grateful for the opportunity to attend church with his family.

As noted, the Government and Officer Moscato have no objection to Mr. Rose's requests. Thank you for your attention to this matter.

Respectfully submitted,

/s/ Ariel Werner
Ariel Werner
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cc: Mathew Andrews, Esq.
Louis Pellegrino, Esq.